

The Honorable Ronald B. Leighton

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

SHELLEY DENTON, and all others similarly
situated,

Plaintiff,

vs.

DEPARTMENT STORES NATIONAL BANK,

Defendant.

No. 3:10-cv-05830-RBL

RULE 7.1 CORPORATE DISCLOSURE
STATEMENT OF DEFENDANT
DEPARTMENT STORES NATIONAL
BANK

Under Rule 7.1 of the Federal Rules of Civil Procedure, Defendant Department Stores National Bank ("DSNB") states that Citibank (South Dakota), N.A., a non-public bank, owns 100% of the common stock of DSNB; and that Citigroup, Inc., a public company not owned by any parent company or by any publicly-held corporation owning 10% or more of its stock, in turn owns 100% of the common stock of Citibank (South Dakota), N.A. In addition, Macy's, Inc., owns 49% of a class of non-voting preferred stock of DSNB, but has no equity interest in DSNB. Macy's, Inc. is not owned by any parent corporation or by any publicly held corporation owning 10% or more of its stock.

March 14, 2011

Respectfully submitted,

s/ Robert W. Trenchard

ROBERT W. TRENCHARD (N.Y. Bar No. 2679488)
(admitted pro hac vice)

NOAH A. LEVINE (N.Y. Bar No. 4324521)
(admitted pro hac vice)

PAMELA K. BOOKMAN (N.Y. Bar No. 4492328)
(admitted pro hac vice)

CRAIG R. HEEREN (N.Y. Bar No. 4713053)
(admitted pro hac vice)

WILMER CUTLER PICKERING
HALE AND DORR LLP
399 Park Avenue
New York, NY 10022
Tel: (212) 230-8800
Fax: (212) 230-8888
Robert.Trenchard@wilmerhale.com

JOHN R. BACHOFNER, WSBN #18650
BULLIVANT HOUSER BAILEY PC
805 Broadway St.
Suite 400
Vancouver, WA 98660
Tel: 360.906.6340
Fax: 360.395.8504
John.Bachofner@bullivant.com

*Counsel for Defendant Department Stores National
Bank*

CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Deborah M Nelson
Nelson Boyd PLLC
1700 Seventh Avenue, Suite 2220
Seattle, WA 98101
206-971-7601
nelson@nelsonboydlaw.com

Rachel J Geman
Lief Cabraser Heimann & Bernstein (NY)
250 Hudson Street, 8th Floor
New York, NY 10013-1413
212-355-9500
rgeman@lchb.com

Jeffrey D. Boyd
Nelson Boyd PLLC
1700 Seventh Avenue, Suite 2220
Seattle, WA 98101
206-971-7601
boyd@nelsonboydlaw.com

Randall K Pulliam
Carney Williams Bates Bozeman & Pulliam,
PLLC
11311 Arcade Drive, Suite 200
Little Rock, AR 72212
501-312-8500
rpulliam@carneywilliams.com

Kenneth J Grunfeld
Golomb & Honik, PC
1515 Market Street, Suite 1100
Philadelphia, PA 19102
215-985-9177
kgrunfeld@golombhonik.com

and I hereby certify that I am aware of no non-CM/ECF participants to whom this document should be mailed by United States Postal Service.

DATED: March 14, 2011

s/ Robert W. Trenchard

ROBERT W. TRENCHARD (N.Y. Bar No. 2679488)
(*admitted pro hac vice*)
WILMER CUTLER PICKERING
HALE AND DORR LLP
399 Park Avenue
New York, NY 10022
Tel: (212) 230-8800
Fax: (212) 230-8888
Robert.Trenchard@wilmerhale.com

Counsel for Defendant Department Stores National Bank